

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
	)	No. 2:19-cr-00013
v.	)	
	)	Chief Judge Crenshaw
	)	
GEORGIANNA A.M. GIAMPIETRO	)	

**JOINT STATUS REPORT**

The United States, through the United States Attorney for the Middle District of Tennessee, and the Counterterrorism Section of the National Security Division, U.S. Department of Justice, and Charles D. Swift, counsel for the defendant, Georgianna A.M. GIAMPIETRO, respectfully file this Joint Status Report in advance of the April 3, 2020, status conference date. In an Order dated January 2, 2020, the Court set various deadlines and hearing dates in this case, including a deadline of March 27, 2020 for the government to conclude its production of discovery to the defendant and to submit to the Court the government's filing pursuant to Section 4 of the Classified Information Procedures Act ("CIPA"), as well as a status hearing date of April 3, 2020. (*See* Doc. 89.) The Court's Order also scheduled a follow-up status hearing for June 19, 2020. (*Id.*)

The government has made discovery productions to the defendant consistent with the Court's January 2, 2020 Order, the only exception being a two-week extension the government sought and obtained related to certain undercover video recordings. (*See* Docs. 87, 90, 91, 92, 93, 95.) The government also submitted its CIPA Section 4 filing a day earlier than required, on March 26, 2020. (*See* Doc. 94.) The Defendant, through counsel, received the final production on March 27, and is in the process of reviewing the government's most recent productions.

The parties are mindful of several upcoming deadlines, including the deadline for expert

disclosures (May 15, 2020), *Daubert* motions and other pretrial motions (June 5, 2020), responses to pretrial motions (June 19, 2020), and replies to those responses (July 3, 2020). The government is also aware of its obligation to give notice to the defendant of its intent to use at trial evidence under Federal Rule of Evidence 404(b)(2) sufficiently in advance of trial so as to afford the defendant the opportunity to file a motion in limine regarding the same, if necessary, and that deadlines have been set for Rule of Evidence 404 motions (June 5, 2020), responses to those motions (June 12, 2020), and replies to those responses (July 3, 2020).

At this time, the parties have no further updates to provide to the Court.

Respectfully submitted,

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/s/ Charles D. Swift

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